

BEFORE THE
POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

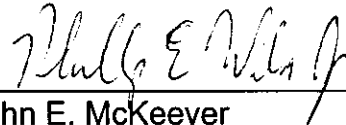
POSTAL RATE AND FEE CHANGES, 2000

DOCKET NO. R2000-1

FIRST SET OF INTERROGATORIES AND REQUESTS
FOR PRODUCTION OF DOCUMENTS FROM
UNITED PARCEL SERVICE TO UNITED STATES
POSTAL SERVICE WITNESS ROBINSON
(UPS/USPS-T34-1)
(February 8, 2000)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatories and requests for production of documents directed to United States Postal Service witness Robinson (UPS/USPS-T34-1).

Respectfully submitted,



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Attorneys for United Parcel Service

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Of Counsel.

INTERROGATORIES OF UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS ROBINSON

UPS/USPS-T34-1. Refer to pages 12-13 of your testimony, where you discuss the contract between Emery Worldwide Airlines ("Emery") and the Postal Service pursuant to which Emery provides mail processing, surface transportation, and air transportation for Priority Mail.

(a) Provide a copy of the current contract between Emery and the Postal Service to which you refer.

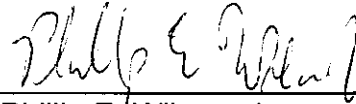
(b) Provide any other documents defining the relationship between the Postal Service and Emery regarding Priority Mail services.

(c) If the contract provided in response to (a) is not the contract used in developing the proposed Priority Mail rates, provide a copy of the contract that was used in developing the proposed Priority Mail rates.

(d) Describe all changes in Postal Service facility utilization, staffing, and transportation usage that resulted from the contract with Emery for Priority Mail processing, surface transportation, and air transportation, and provide any documents that reflect or describe these changes.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document by first class mail, postage prepaid, in accordance with Section 12 of the Commission's Rules of Practice.



Phillip E. Wilson, Jr.
Attorney for United Parcel Service

Dated: February 8, 2000
Philadelphia, Pa.

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